

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF VIRGINIA**

Danville Division

UNITED STATES OF AMERICA,

v.

KANAS LAMONT'E TRENT,

Defendant.

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Case No. 4:18cr00011

MOTION IN LIMINI TO REDACT DEFENDANT'S NAME FROM TRIAL EXHIBITS

Comes now the defendant, Kanas L. Trent, by counsel, and moves this Court for entry of an Order directing the United States to redact his name which is listed on any pieces of evidence or packaging that contains pieces of evidence intended as an exhibit in the trial of this matter and states the following in support thereof:

The United States has collected 2,215 trial exhibits. A number of those exhibits are contained in packaging which has Defendant's name on it. For example, Government Exhibit 2101 is an item of evidence (a firearm) that is contained in packaging (a box) that has defendant's name labeled on it.

Placing Defendant's name on the packaging for these trial exhibits undercuts his right to the presumption of innocence. Permitting Defendant's name to remain on the packaging of any trial exhibit allows the fact finder to link that piece of evidence to your Defendant and relieves the United States of proving each and every element of the crimes charged beyond a reasonable doubt.

The trial exhibits discussed herein present only a small number of the trial exhibits by the United States. That being said, your Defendant objects to his name remaining on any packaging for trial exhibits.

WHEREFORE, your Defendant respectfully moves this Court for an Order directing the United States to redact his name from Government's Exhibit 2101, as well as any other packaging of trial exhibits intended to be introduced as an exhibit in the trial of this matter.

Respectfully submitted,
Kanas Lamont'e Trent
By Counsel

/s/

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Counsel for Mr. Trent

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 23rd day of August, 2019, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notification of

such filing to all parties.

/s/

Michael T. Hemenway, VSB #29820
Counsel for the Defendant